



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP  
F. #2021R00600

*271 Cadman Plaza East  
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November 13, 2024

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By Email and ECF

Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

<b>Bates No.</b>	<b>Description of Item</b>
EDNY_011923- EDNY_011926	Record Documenting the Search of the Sun and Hu Residence
EDNY_011927- EDNY_011928	Invitation Letter Dated March 26, 2018

<b>Bates No.</b>	<b>Description of Item</b>
EDNY-011929- EDNY_011930	Invitation Letter Dated September 18, 2019
EDNY_011931- EDNY_013481	Records from Bank of America
EDNY_013482- EDNY_016467	Records from Flagstar Bank, formerly known as Signature Bank
EDNY_016468- EDNY_016468	Records from Shopify Inc.
EDNY_016469- EDNY_016478	Record Documenting an Interview with Linda Sun on July 15, 2020
EDNY_016479- EDNY_016479	Records of Electronic Communications between the Persons Identified in the Indictment as CC-1 and the Associate, Accompanied by Draft Translations
EDNY_016480- EDNY_016480	Records of Electronic Communications between the Person Identified in the Indictment as CC-1 and Linda Sun, Accompanied by Draft Translations

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Alexander A. Solomon  
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cc: Clerk of the Court (BMC) (by ECF) (without download link)